

FILED

AUG 18 2015

STATE OF MISSOURI

COUNTY OF ST. LOUIS

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JOAN M. GILMER  
CIRCUIT CLERK, ST. LOUIS COUNTY

In Division 35 Circuit Court of ST. LOUIS COUNTY

**STATE OF MISSOURI**  
**SEARCH WARRANT**

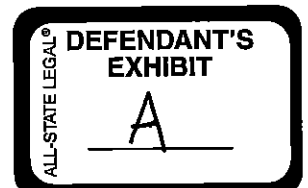
TO ANY POLICE OFFICER OF ST. LOUIS COUNTY, STATE OF MISSOURI,  
GREETINGS:

WHEREAS, Detective Michael Slaughter, DSN 3562, of the St. Louis County Police Department, on the 18 day of August, 2015 presented to Judge Bar Smith of Division 35 of the Circuit Court of the County of St. Louis, State of Missouri, his duly verified application and petition in writing as provided by law stating upon information and belief that certain items believed to be evidence of the commission of a crime and contraband consisting of child pornography, to wit:

Photographs, files and graphic images depicting sexual contact or a sexual performance including actual or simulated, normal or perverted acts of human masturbation, deviate sexual intercourse, sexual intercourse or physical contact with or touching of a person's clothed or unclothed genitals, pubic area, buttocks, anus, or the breast of a female in an act of apparent sexual stimulation or gratification and which has as one of its participants or portrays as an observer of such conduct, contact or performance, a child or minor under the age of 18, electronic data processing and storage devices, computers and computer systems including central processing units, internal peripheral storage devices such as fixed discs, external hard discs, floppy discs and diskettes, tape drives and tapes, optical storage device or other memory storage devices, peripheral input/output devices such as keyboards, printers, video display monitors, optical readers and related communication devices such as modems, routers and other wireless devices; any and all cameras and related equipment, video and audio recorders and all related recording equipment; any and all photographs, copies of photographs and any manufactured hard copy of images related to child pornography; any and all logs containing user names, passwords and documentation or other identifiers necessary to examine or operate items; together with system documentation, operating logs and handwritten notes related to user identifications, passwords and/or child pornography;

Are being kept and secreted in St. Louis County, Missouri upon the following premises:

9524 Corregidor Drive, St. Louis, Missouri, 63134 is a single family residence constructed of red brick, and a grey roof. The residence has a permanently affixed number 9524 mounted on a porch post in front of the residence. The front door is white in color.

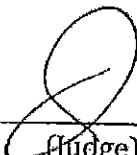


In violation of the laws of the State of Missouri.

WHEREAS, from the facts set forth in said verified petition and attached affidavit, it is found by me that there is probable cause to believe that the laws of the State of Missouri are being violated at and in and upon the premises described above and that said items constitute evidence of the commission of a crime.

NOW, THEREFORE, these are to command you that you search the said premises above described within 10 days after the issuance of this warrant by day or night, and take with you, if need be, the power of your county, and, if said above described property of any part thereof be found on said premises by you, that you seize the same and take same into your possession, making a complete and accurate inventory of the property so taken by you in the presence of the person from whose possession the same is taken, if that be possible, and giving to such person a receipt for such property, together with a copy of this warrant, or, if no person be found in possession of said property, leaving said receipt and said copy upon the premises searched, and that you thereafter return the property so taken and seized by you, together with a duly verified copy of the inventory thereof and with your return to his warrant to this court to be herein dealt with in accordance with law. You are further commanded to search the computers, cameras, storage devices, and electronic devises seized by you, including any files that are password protected or encrypted, for evidence of ownership and usage, files and graphic images depicting child pornography depicting sexual contact or a sexual performance including actual or simulated, normal or perverted acts of human masturbation, deviate sexual intercourse, sexual intercourse or physical contact with or touching of a person's clothed or unclothed genitals, pubic area, buttocks, anus, or the breast of a female in an act of apparent sexual stimulation or gratification and which has as one of its participants or portrays as an observer of such conduct, contact or performance a child or minor, under the age of 18.

WITNESS my hand and seal of this court this 18 day of August, 2015 at 1405

  
(Judge)

STATE OF MISSOURI

COUNTY OF ST. LOUIS

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} SS  
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In Division 35 Circuit Court of ST. LOUIS COUNTY

**STATE OF MISSOURI**  
**SEARCH WARRANT**

TO ANY POLICE OFFICER OF ST. LOUIS COUNTY, STATE OF MISSOURI, GREETINGS:

In the matter of: **Search Warrant**

**APPLICATION FOR SEARCH WARRANT**

I, Detective Michael Slaughter, DSN 3562, of the St. Louis County Police Department, being duly sworn depose and state upon information and belief that the premises known, numbered and designated as:

9524 Corregidor Drive, St. Louis, Missouri, 63134 is a single family residence constructed of red brick, and a grey roof. The residence has a permanently affixed number 9524 mounted on a porch post in front of the residence. The front door is white in color.

is being used for the purpose of secreting:

evidence of the commission of a crime and contraband consisting of child pornography, to wit:

Photographs, files and graphic images depicting sexual contact or a sexual performance including actual or simulated, normal or perverted acts of human masturbation, deviate sexual intercourse, sexual intercourse or physical contact with or touching of a person's clothed or unclothed genitals, pubic area, buttocks, anus, or the breast of a female in an act of apparent sexual stimulation or gratification and which has as one of its participants or portrays as an observer of such conduct, contact or performance, a child or minor under the age of 18, electronic data processing and storage devices, computers and computer systems including central processing units, internal peripheral storage devices such as fixed discs, external hard discs, floppy discs and diskettes, tape drives and tapes, optical storage device or other memory storage devices, peripheral input/output devices such as keyboards, printers, video display monitors, optical readers and related communication devices such as modems, routers and other wireless devices; any and all cameras and related equipment, video and audio recorders and all related recording equipment; any and all photographs, copies of photographs and any manufactured hard copy of images related to child pornography; any and all logs containing user names, passwords and documentation or other identifiers necessary to examine or operate items; together with system documentation, operating logs and handwritten notes related to user

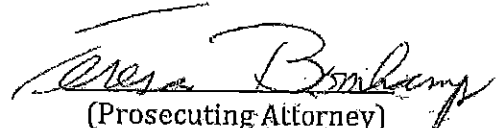
identifications, passwords and/or child pornography;

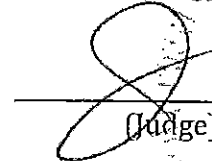
That the basis of affiant's information and belief is contained in the attached affidavits of witnesses to facts concerning the said matter which affidavits are made a part hereof and are submitted herewith as a basis upon which this court may find the existence of probable cause for the issuance of said warrant.

WHEREFORE, your petitioner prays that a search warrant be issued as provided by law.

  
(Police Officer) 3847

Subscribed and sworn to before me this 18 day of August, 2015 at 1405.

  
(Prosecuting Attorney)

  
(Judge)

STATE OF MISSOURI

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} SS  
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COUNTY OF ST. LOUIS

**AFFIDAVIT**

This affiant, Detective Michael Slaughter, DSN 3562, of the St. Louis County Police Department of lawful age, being first duly sworn, deposes and says that he has reason to believe:

Photographs, files and graphic images depicting sexual contact or a sexual performance including actual or simulated, normal or perverted acts of human masturbation, deviate sexual intercourse, sexual intercourse or physical contact with or touching of a person's clothed or unclothed genitals, pubic area, buttocks, anus, or the breast of a female in an act of apparent sexual stimulation or gratification and which has as one of its participants or portrays as an observer of such conduct, contact or performance, a child or minor under the age of 18, electronic data processing and storage devices, computers and computer systems including central processing units, internal peripheral storage devices such as fixed discs, external hard discs, floppy discs and diskettes, tape drives and tapes, optical storage device or other memory storage devices, peripheral input/output devices such as keyboards, printers, video display monitors, optical readers and related communication devices such as modems, routers and other wireless devices; any and all cameras and related equipment, video and audio recorders and all related recording equipment; any and all photographs, copies of photographs and any manufactured hard copy of images related to child pornography; any and all logs containing user names, passwords and documentation or other identifiers necessary to examine or operate items; together with system documentation, operating logs and handwritten notes related to user identifications, passwords and/or child pornography;

Are being kept and secreted in the place described as:

9524 Corregidor Drive, St. Louis, Missouri, 63134 is a single family residence constructed of red brick, and a grey roof. The residence has a permanently affixed number 9524 mounted on a porch post in front of the residence. The front door is white in color.

Affiant states that he has reason to believe such goods are being secreted therein because:

1. This Affiant, Detective Michael Slaughter, DSN 3562, has been employed as a Police Officer for approximately ten years, and is currently assigned as a Detective to the Division of Criminal Investigation, Special Investigations Unit with the St. Louis County Police Department. During the course of this time period, this affiant has had numerous contacts and dealings with informants, other police officers, subjects known to possess and sell obscene material, subjects known to possess, distribute and manufacture child pornographic images, adult subjects conducting sexually explicit electronic chat sessions with minors and visually exposing their genitals to the minor via web cam chats. This affiant has received specialized training in the area of computer-based investigations, including but not limited to the ICAC Investigative Techniques, ICAC Undercover Chat Techniques, ICAC Peer to Peer Investigations, TUX4n6 software, Forensic Scan, Cellebrite and OS Triage Forensic Tools. This affiant has assisted with investigations and search warrants relative to the crimes of manufacturing, possession, of electronic videos and images. This affiant is also familiar with investigating Cyber tip reports, conducting on-scene interviews and knock and talk techniques.
2. The statements in this affidavit are based in part on this affiant's personal knowledge or information provided by other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a search warrant, your affiant has not included each and every fact concerning this investigation.
3. Special Investigator (SI) Wayne Becker is a certified Missouri Peace Officer employed as a sworn Deputy with Dent County Sheriff's Department since 2004. SI Wayne Becker has over 600 hours of training recognized and certified by the Missouri Peace Officers Standards and Training commission and has had over 450 additional hours of training, in the investigation of computer use in the exploitation of children, and in the methods of forensic analysis of computers used in criminal activity, including the use of peer-to-peer (P2P) and file sharing networks. SI Wayne Becker has an Associates of Science degree in Data Processing from St. Louis Community College, is a certified computer forensic examiner, has over 30 years of experience in the Information Technology industry, and is an instructor in Basic Electronic Evidence Recovery for the Missouri Internet Crimes Against Children (ICAC) Task Force. SI Wayne Becker is the Dent County Sheriff's Department's representative on the Missouri ICAC Task Force and coordinates the South Central Missouri Computer Crime Task Force.
4. This affiant received information from SI Wayne Becker, of the Dent County Sheriff's Department related to child pornography. SI Wayne Becker stated in September 2011, he began an undercover operation collecting keys and files being shared on a "*Freenet*", a publicly available peer to peer network, in order to build a data base of keys associated with known or suspected child pornography images and videos.
5. In April 2012, SI Wayne Becker began running copies of *Freenet* that had been modified for law enforcement to log the IP address, key, and date and time of requests that were sent to these law enforcement *Freenet* nodes. These keys are then compared to keys of known child pornography.



6. While reviewing requests received by undercover *Freenet* nodes, located in Missouri, SI Becker observed IP address 172.12.235.62 routing and/or requesting suspected child pornography file blocks. The number and timing of the requests was significant enough to indicate that the IP address was the apparent original requester of the file.

7. SI Becker observed that on April 2, 2015 between 11:08PM UTC and 11:10PM UTC a computer running *Freenet* software, at IP address 172.12.235.62, requested from *Freenet* law enforcement nodes 69 parts, or blocks, of the e following file:

SHA1: *BODS262HHKS3VS4FLQSOAAVAWTOE5FAW*

File Name: *Anonther Set 2 (set 2).zip*

SI Wayne Becker has downloaded this video file with the referenced SHA1 value from *Freenet* and it is described as follows:

Description: This folder contains 17 jpg images, all off a female child, 3-5 years of age. In all of the images she is wearing only a night shirt and it is pulled up. Her legs are spread displaying her genitals. An adult males hand can be seen spreading her buttocks for the camera in 2 of the images. In 4 of the images an unseen male's penis is penetrating the child anally.

8. On August 12, 2015 this affiant viewed the above listed files and observed that they contained the imagery described above that this affiant believes to be child pornography.

9. A subpoena was sent to AT&T Internet Services for user/subscriber information, to include method and type of payment for the IP address of 172.12.235.62 assigned on the above date and times. A response from AT&T Internet Services, advising that this was an AT&T U-Verse account and the IP address of 172.12.235.62 was assigned to Janis Dickerman as of September 24, 2014, giving a service and billing address of 9524 Corregidor Drive, Saint Louis, Missouri, 63134, with a telephone number of (314)651-9163.

10. An Ameren UE Utilities check revealed 9524 Corregidor Drive, St. Louis, Missouri, 63134, to be registered to Janis Dickerman, since 01/1999.

12. This affiant knows from training and experience that computer users can install publicly available software that accesses a network known as *Freenet*. *Freenet* is a distributed, Internet based, peer-to-peer network which lets a user anonymously share files and chat on forums. *Freenet* is free software and the source code is publicly available. Communications between computers running *Freenet*, or nodes, are encrypted and routed through other *Freenet* nodes making it difficult to determine who is requesting the information and what the content is of the information being requested. *Freenet* provides a platform for message forums and *Freesites*, websites only available through *Freenet*.

13. This affiant knows from training and experience that files, or parts of files, are stored in *Freenet* using a key created from a compressed digital representation method called Secure Hash Algorithm Version 256 or SHA256.

14. This affiant knows from training and experience that *Freenet* breaks a file into small pieces, or blocks, each with their own unique key based on this SHA256 value. These small blocks are then distributed across *Freenet* users, or nodes, and stored in disk space provided by each user to *Freenet*. No one user has the entire intact file. The keys to all of the parts of a file are found in a high level index block, or manifest. *See exhibit*

15. This affiant knows from training and experience that Internet computers identify each other by an Internet Protocol or IP address. Your affiant knows that these IP addresses can assist law enforcement in finding the location of a particular computer on the Internet. These IP addresses lead the law enforcement officer to a particular Internet service provider or company (ISP). Given the date and time the IP address was used, an ISP can typically identify the account holder by name and physical address.

16. This affiant knows from training and experience that a computer running *Freenet* will receive requests from other computers running *Freenet* containing the key of a part of a file to retrieve from that node's data store, or to forward to another user that may have that part of the file.

17. This affiant knows from training and experience that *Freenet's* attempt to hide what a user is requesting from the network has attracted persons that wish to collect and/or share child pornography files. *Freenet* is not a significant source of music, adult pornography, theatrical movies or other copyright material. *See exhibit*

18. This affiant knows from training and experience that *Freenet* users connect to other users, unknown to them, or peers. They then send requests to these peers for the blocks of files they are attempting to download.

19. This affiant knows from training and experience that the requests that a user of *Freenet* sends to a peer contain only the key for the block of data and not the encryption password to make the data readable. A user relies on the inability of a peer to decrypt a block of data or know what file contains this block to hide his use of the *Freenet* network to obtain child pornography files.

20. This affiant knows from training and experience that someone requesting blocks of a file has taken substantial steps to install *Freenet* and locate a file's key to download. *Freenet* provides no search mechanism common to other file sharing systems. A subject desiring to download a file must first find the key on a *Freesite* or message board containing material of interest.



21. This affiant knows from training and experience that streams of requests for blocks of a particular file from an IP address can be evaluated to determine if the IP address is the likely requester of the file.

22. This affiant knows from training and experience that some people who collect child pornography tend to keep the images they obtain for extended periods of time and do not delete the images. They tend to regard the images as trophies and use them for sexual gratification. They also use the collected images and videos of child pornography as bargaining tools when trading child pornography with other individuals. While others delete these images knowing they are able to acquire them again with the use of the internet.

23. This affiant knows from training and experiences that people who tend to collect images of child pornography use video and audio components to capture and record child pornography. They are also known to transfer these images to other digital media storage devices.

24. This affiant knows from training and experience that it is possible to recover digital files forensically even if they have been deleted.

WHEREFORE, your petitioner prays that a search warrant be issued as provided by law.

Det. Sanghvi  
(Police Officer) 3562

Sworn and subscribed before me this 18 day of August, 2015, at 1405.

[Signature]  
(Judge)

the Court's decision in *United States v. Galt*, 2016 WL 1000000 (S.D. Cal. 2/24/16), which held that the government's failure to disclose certain evidence constituted a material omission.

The Court also noted that the government's failure to disclose certain evidence constituted a material omission. The Court further noted that the government's failure to disclose certain evidence constituted a material omission.

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